

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

VICTORIA L. FRAZIER,

Plaintiff,

v.

CIVIL NO. 3:11cv497

**EXPERIAN INFORMATION SOLUTIONS,
INC., et al.**

Defendants.

PLAINTIFF'S SECOND SUPPLEMENTAL F.R.C.P. 26(a)(1) DISCLOSURES

COMES NOW the Plaintiff, **VICTORIA L. FRAZIER**, by counsel, and makes the following supplemental disclosures:

I. Individuals likely to have discoverable information

13. John Michael Meredith
328 Ebaugh Drive, SE
Leesburg, VA 20175

All facts regarding how Plaintiff was affected when she learned about the inaccurate Litton loan information reporting on her credit reports; Plaintiff's attempts to have Litton correct their error and Plaintiff's increasing depression and weight gain due to the continuing stress when her attempts failed; knowledge about Plaintiff's failed attempts to obtain employment and her inability to co-sign on a loan document for him.

II. Description of documents in possession of the Plaintiff.

Other than those documents obtained from any Defendant in discovery, the Plaintiff has the following supplemental and additional documents in her possession and control:

Documents received from Experian – ExpFrazier 000001 – 000072.

Plaintiff reserves the right to further supplement these disclosures.

VICTORIA FRAZIER

/s/

Leonard A. Bennett, Esq.
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Attorney for Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of March, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Gary L. Edwards
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Johnson City, TN 37604
Email: gedwards@bakerdonelson.com

Counsel for Litton Loan Servicing, LP.

VICTORIA L. FRAZIER

/s/

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